

## REMARKS

In the Final Office Action,<sup>1</sup> the Examiner repeated the rejection of claims 1, 2, 5-7, 11-18, 21, 22, 24-31, 34, 35, 37-43, 46, 47, 49-55, and 59-63 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,370,549 to Saxton ("Saxton") in view of U.S. Patent Application Publication No. 2002/0052954 to Polizzi et al. ("Polizzi"); claims 3, 4, 19, 20, 32, 33, 44, 45, 56, 57, and 64 under 35 U.S.C. § 103(a) as being unpatentable over Saxton and Polizzi and further in view of the XBRL Specification by Hamscher et al. ("Hamscher"); and claims 8-10, 23, 36, 48, and 58 under 35 U.S.C. § 103(a) as being unpatentable over Saxton and Polizzi and further in view of U.S. Patent No. 6,134,563 to Clancey et al. ("Clancey"). Claims 1-64 are currently pending. Of these, claims 1, 17, 29, 30, 42, 54, and 62 are independent. Applicants respectfully traverse the rejections and request the Examiner's reconsideration of the pending claims for the following reasons.

### A. Information Disclosure Statement

In the Final Office Action, the Examiner repeated the request for legible copies of three documents referenced in the Information Disclosure Statements filed on January 16, 2003, and on June 13, 2005. Applicants submitted legible copies of the documents (consisting of three books) with the Information Disclosure Statement dated

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

June 13, 2005, but it appears the Examiner did not receive them. Applicants' representative has contacted the Examiner by telephone to ask whether a duplicate set of the references should be submitted. The Examiner has agreed to make an inquiry into the matter with personnel at the Office before requiring a duplicate set of references.

**B. Claim Rejections - 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1, 2, 5-7, 11-18, 21, 22, 24-31, 34, 35, 37-43, 46, 47, 49-55, and 59-63 under 35 U.S.C. § 103(a) as unpatentable over Saxton in view of Polizzi. Applicants respectfully disagree with the Examiner's arguments and conclusions, and respectfully submit that a *prima facie* case of obviousness has not been established.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), each of three requirements must be met. First, all the claim limitations must be taught or suggested by the prior art. See M.P.E.P. § 2143.03 (8<sup>th</sup> ed., rev. 2, May 2004). Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must "be found in the prior art, not in applicant's disclosure." M.P.E.P. § 2143 (8<sup>th</sup> ed., rev. 2, May 2004).

For example, amended claim 1 recites, among other things: “an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report.” Saxton and Polizzi, taken alone or in combination, fail to teach or suggest at least this element of claim 1, or similar recitations in claims 17, 29, 30, 42, and 54.

The final rejection of claim 1 is a substantial duplicate of the rejection in the March 22, 2005, Office Action, as the Examiner has applied the same arguments almost identical to how they appeared in the previous Office Action. In the Final Office Action, however, the Examiner did not address the substance of Applicants’ arguments presented in the Reply to Office Action of June 13, 2005. That being said, the M.P.E.P. requires that all actions on the merits issued by an Examiner “be complete and clear as to all matters.” 37 C.F.R. § 1.104(b). See also M.P.E.P. § 707.07. Specifically, 37 C.F.R. § 1.104(c)(2) provides that

“[i]n rejecting claims for want of novelty or for obviousness, the examiner must cite the best reference at his or her command. *When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference ... must be clearly explained...*” (italics added).

See also M.P.E.P. §707.

For example, in the Final Office Action, the Examiner observed that Saxton fails to disclose an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report and retrieves data from one or more sources to represent one or more values within the

report. See Final Office Action, page 3. In an attempt to remedy this deficiency, the Examiner proposed combining Polizzi with Saxton. See Final Office Action, page 3 (citing Polizzi, Abstract, paragraphs [0024] and [0039]). In particular, the Examiner asserted that “Polizzi discloses object includes HTML and SQL files are stored in a repository and arranged in a hierarchy or a tree system (software elements), and processing jobs that can retrieve data within a portal system (include repository) to generates reports.” See Final Office Action, page 10 (citing Polizzi, paragraphs [0024] and [0025]). These assertions, however, do not address the substance of Applicants’ remarks because they do not point to any teaching or suggestion in the prior art of “an editor that develops a report by referencing the software elements . . . *to form a structure of the report,*” as claimed.

Moreover, the Examiner’s assertion that “Polizzi discloses . . . processing jobs that can retrieve data within a portal system (include repository) to generates reports” is factually incorrect. Polizzi describes a repository 235 for storing objects (also called computer files). Polizzi, paragraph [0024]. The Examiner appears to draw a correspondence between the objects in repository 235 and the claimed “text documents.” See Final Office Action, page 3 (“[T]he objects can be any computer file such as text documents; these text documents are organized or arranged in a hierarchy.”). However, Polizzi does not describe generating reports based on the objects in repository 235. Instead, Polizzi describes generating reports based on data in back-end databases 200, 205, and 210. (Polizzi, paragraph [0025]) and storing the

reports as objects in repository 235 (id., paragraph [0024] (“These objects may include . . . output reports.”)).

Moreover, neither data stored in back-end databases 200, 205, and 210, nor objects stored in repository 235 are referenced “to form a structure of [a] report,” as claimed. Instead, Polizzi describes generating report output formats using “associated object properties 410,” which are stored in a relational database. See Polizzi, paragraphs [0051] and [0053]. Such disclosure does not constitute “an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report,” as claimed.

Accordingly, no *prima facie* case of obviousness has been established with respect to claims 1, 17, 29, 30, 42, and 54, and Applicants respectfully request that the Examiner withdraw the rejection under 35 U.S.C. § 103(a).

Claims 2, 4-16, 18, 20-28, 31, 33-41, 43, 45-53, 55, and 57-61 depend from and add additional features to each of independent claims 1, 17, 30, 42, and 54. Accordingly, these claims are allowable for at least the reasons set forth above and Applicants respectfully request that the Examiner withdraw the rejection of these claims under 35 U.S.C. § 103(a).

Applicants respectfully traverse the rejection of claim 62 under 35 U.S.C. § 103(a) as unpatentable over Saxton in view of Polizzi. Applicants respectfully disagree with the Examiner’s arguments and conclusions, and respectfully submit that a *prima facie* case of obviousness has not been established.

For example, claim 62 recites, among other things, “a parser that . . . interprets tags included in the one or more text documents to create software elements, and determines the hierarchy of the software elements within a structure representative of the one or more text documents.” Saxton and Polizzi, taken alone or in combination, fail to teach or suggest at least this element of claim 62.

Saxton describes a method and apparatus for locating and maintaining locations of files within a directory tree structure. See Saxton, Abstract. The Examiner asserted that “Saxton discloses files (documents) and . . . [that] the content of the files contains tags the permit the file location to contain other information pertaining to each component file in the record (col. 8, lines 48-64).” However, Saxton describes tags as being in a Tag column 308 of a file location cache 300 depicted in Fig. 3A. See id., col. 8, lines 61-64. Therefore, the tags are not contained in the content of the files themselves, as asserted by the Examiner. In contrast, claim 62 requires that “tags [be] included in the one or more text documents.”

Moreover, claim 62 requires a parser that “interprets tags . . . to create software elements, and determines the hierarchy of the software elements within a structure representative of the one or more text documents.” Saxton, on the other hand, describes an “application program” that uses tags “to quickly distinguish between similar component files.” Id., col. 9, lines 55-67. Quickly distinguishing between similar component files does not constitute “[creating] software elements, and [determining] the

hierarchy of the software elements within a structure representative of the one or more text documents," as claimed.

Because Saxton and Polizzi fail to teach or suggest every claim element of claim 62, the 35 U.S.C. § 103(a) rejection of claim 62 and claim 63, which depends from claim 62, should be withdrawn. Claims 3, 4, 19, 20, 32, 33, 44, 45, 56, 57, and 64 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Saxton and Polizzi and further in view of Hamscher. No *prima facie* case of obviousness has been established with respect to these claims for at least the reason that the references, taken alone or in combination, do not teach or suggest each and every element recited in the claims.

Hamscher is directed to a XBRL Specification for defining XBRL elements and attributes that can be used in the creation, exchange, and comparison tasks of financial reporting (see Hamscher, Abstract), but fails to cure the above-identified deficiencies of Saxton and Polizzi. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 3, 4, 19, 20, 32, 33, 44, 45, 56, 57, and 64 under 35 U.S.C. § 103(a).

Claims 8-10, 23, 36, 48, and 58 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Saxton and Polizzi and further in view of Clancey. No *prima facie* case of obviousness has been established with respect to these claims for at least the reason that the references, taken alone or in combination, do not teach or suggest each and every element recited in the claims.

Clancey is directed to a method of creating and editing reports using a predefined report that can be customized (see Clancey, col. 24, lines 5-30). However, like Hamscher, Clancey fails to cure the above-identified deficiencies of Saxton and Polizzi. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claims 8-10, 23, 36, 48, and 58 under 35 U.S.C. § 103(a).

**Conclusion**

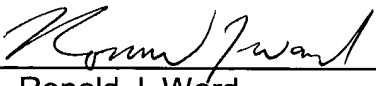
In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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